

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

RAMON A MONTANEZ MARTINEZ
ZORAIDA ESQUILIN RODRIGUEZ
Debtors

CASE NO. 11-10531 (BKT)

CHAPTER 13

OBJECTION TO POST CONFIRMATION OF PLAN

TO THE HONORABLE COURT:

NOW COMES, RNPM LLC, through counsel, and most respectfully **STATES** and **PRAYS**:

1. On March 31, 2014, Debtor filed an amended plan of reorganization.
2. Appearing party objects same because the plan does not provide for payment of pre petition arrears in the amount of \$1,173.38 (claim #7) accordingly fails to comply with 11 USC 1322(b).
3. The proposed plan is predicated on repaying claim #7 through loss mitigation.

4. In is a much as the loan modification has not yet been approve we appose the proposed plan of reorganization because it is does not comply with 11 U.S.C 1322.

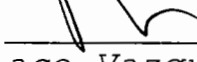
5. Additionally Debtor is causing unreasonable delay which is prejudicial to creditors.

WHEREFORE, it is respectfully requested that this motion be granted, with such further relief as is deemed appropriate in the circumstances.

I CERTIFY, that on this same date, I electronically filed the foregoing with the Clerk of this Court via CM/ECF system, which will electronically send notification of such filing to the following to: **Mr. Roberto Figueroa Carrasquillo; Mr. Alejandro Oliveras Rivera; and Ms. Monsita Lecaroz Arribas.**

In San Juan, Puerto Rico, this 1, day of April, 2014.

WVS LAW LLC
17 Mexico St., Suite D-1
San Juan, PR 00917-2202
Tel: 787-756-5730
Fax: 787-764-0340
Email: wvslawllc@gmail.com

By: 
Wallace Vazquez Sanabria-125101